

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

JAVIER SEGOVIA MENDIOLA

Plaintiff,

V.

**KENNETH P. HARTLEY and KEVIN
P. HARTLEY, HARTLEY
PRODUCE, LLC, and B & H FARMS,
LLC**

Defendants.

CIVIL ACTION NO. 7:22-cv-00401

**ATTORNEY A. VAIL KOHNERT-YOUNT’S UNOPPOSED MOTION
TO WITHDRAW AS COUNSEL FOR PLAINTIFF**

Comes now attorney Vail Kohnert-Yount, and files this, her Motion to Withdraw as Counsel for Plaintiff, and respectfully shows the Court as follows:

As of February 24, 2023, the undersigned will be leaving her employment with Texas RioGrande Legal Aid, Inc., in order to work at an employer not engaged to represent Plaintiff.

For this reason, the undersigned respectfully requests that she be permitted to withdraw as counsel of record for Plaintiff. Plaintiff will continue to be represented by Texas RioGrande Legal Aid, Inc., and attorneys Lakshmi Ramakrishnan and Alan Dicker. Alan Dicker will be designated as attorney-in-charge for Plaintiff. Plaintiff is aware of this motion and the change in circumstances that necessitate the withdrawal of counsel, and he does not have any agreement with the undersigned to continue representation.

This Motion is not made for the purpose of delay or for any other dilatory reason, but is filed so that the interests of justice may be served.

Defendants' counsel does not oppose this motion.

WHEREFORE, premises considered, attorney Vail Kohnert-Yount respectfully requests that the Court grant this Motion and allow the undersigned to withdraw as counsel of record for Plaintiff.

Dated: February 24, 2023

Respectfully submitted,

TEXAS RIOGRANDE LEGAL AID

/s/ A. Vail Kohnert-Yount

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing document on counsel for Defendants in this matter by filing the same with the court's electronic filing system on February 24, 2023.

/s/ A. Vail Kohnert-Yount
A. Vail Kohnert-Yount

CERTIFICATE OF CONFERENCE

I hereby certify that I asked counsel for Defendants if it would oppose this motion and was told that Defendants are unopposed.

/s/ A. Vail Kohnert-Yount
A. Vail Kohnert-Yount